EFFECTIVE DATE: June 24, 2004

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MARSHALL WORK INSTRUCTION

AD01

HAZARDOUS MATERIAL MANAGEMENT

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DOCUMENT HISTORY LOG

Status (Baseline/ Revision/ Canceled)	Document Revision	Effective Date	Description
Baseline		6/16/02	
Revision	A	6/24/2004	Added language throughout document to specify use of the Marshall Retail Store for ordering chemicals. Restructured Section 6.2.

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1. PURPOSE

This Marshall Work Instruction (MWI) establishes instructions for maintaining an inventory of hazardous materials, i.e., chemicals used/stored onsite. This MWI also establishes a requirement for all employees, Government and contractor, to order chemicals through the Marshall Retail Store. Government employees are required to purchase chemicals through the Marshall Retail Store. Contractors are strongly encouraged to do so. This allows the Center to maintain a more accurate chemical inventory, maintain a safer work environment, and may reduce or eliminate the need for employees to manually update their annual chemical inventories.

2. APPLICABILITY

This MWI applies to Marshall Space Flight Center (MSFC) employees and contractors who use or store hazardous materials (i.e., chemicals) onsite and/or maintain a chemical inventory. Construction of Facilities, Facilities Work Requests, and credit card construction are excluded from the hazardous material approval cycle defined in Section 6.2.

3. APPLICABLE DOCUMENTS

- 3.1 MPG 8500.1, "MSFC Environmental Management Program"
- 3.2 MPG 1840.2, "MSFC Hazard Communication Program"
- 3.3 MPG 1840.3, "MSFC Hazardous Chemicals in Laboratories Protection Program"
- 3.4 MPG 3410.1, "Training"
- 3.5 MWI 4300.1, "Disposal Turn-Ins/Reutilization Screening"
- 3.6 MWI 4500.1, "Supply Management: Storage and Issue"
- 3.7 MWI 5100.1, "Procurement Requisitioners Guide"
- 3.8 MWI 5113.1, "Governmentwide Commercial Purchase Card Operating Procedures"
- 3.9 MWI 8550.1, "Waste Management"

4. REFERENCES

MWI 5100.1, "Procurement Requisitioners Guide"

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5. DEFINITIONS

- 5.1 The definitions in MPG 8500.1 are applicable.
- 5.2 Chemical inventory reprints Printouts or spreadsheets of chemical inventories for previous years.

6. INSTRUCTIONS

- 6.1 Procurement of Hazardous Materials
- 6.1.1 Evaluate onsite resources to determine if the requirement can be met by obtaining chemicals from other users by viewing the chemical inventory at the following hyperlink:

http://eemo.msfc.nasa.gov/environmental/haz mat/

- If the chemical is onsite, contact the organization point of contact (POC) to determine if it can be obtained.
- 6.1.2 Evaluate and determine availability of less hazardous product substitutes.
- 6.1.3 Order chemicals in container sizes appropriate for the use. Do not order excess amounts. Containers must be shatterproof, where applicable. If proper container size is not available, the MSFC user organization may request that the required size be available through the Marshall Retail Store. Procurement of chemicals shall be in accordance with MWI 5100.1, "Procurement Requisitioners Guide," where applicable.
- 6.1.4 Government employees shall, and contractors are strongly encouraged to, order chemicals from the Marshall Retail Store located in Building 4752 or at the following website:

http://msfc.azorinc.com/popup.aspx

Doing so allows MSFC to maintain a more accurate chemical inventory, provides a safer work environment, and may reduce or eliminate the user's responsibility to annually update his/her chemical inventory. The Marshall Retail Store is required to provide purchased chemicals within three days of ordering.

- 6.2 Approval of Hazardous Material Procurements
- 6.2.1 The procurement of all hazardous material (chemical)

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procurements brought onto MSFC shall be reviewed and approved by the Environmental Engineering Department (EED) and the Occupational Medicine and Environmental Health Services (OMEHS) prior to purchase. This includes items procured in accordance with the process described in MWI 5100.1, "Procurement Requisitioners Guide," and MWI 5113.1, "Governmentwide Commercial Purchase Card Operating Procedures." Chemicals purchased through the Marshall Retail Store automatically go through this review/approval process.

- 6.2.2 EED and OMEHS review hazardous material purchase requests within 48 hours of receipt to determine the following:
- (a) Potential effects to air and water permits; (b) Additional reporting requirements for extremely hazardous substances;
- (c) Ozone depleting substances (these must be phased out by 2010); (d) Suitability of the chemical for the intended use;
- (e) Additional approvals required, if necessary; and
- (f) Potential alternative chemicals, if in non-critical application.
- 6.2.3 All hazardous material requests for adding hazardous material items to the Marshall Retail Store stock must be reviewed and approved by EED in accordance with MWI 4500.1, "Supply Management: Storage and Issue."
- 6.2.4 All hazardous material requests obtained from Excess Reutilization Screening must be reviewed and approved by EED in accordance with MWI 4300.1, "Disposal Turn-ins/ Reutilization Screening."
- 6.2.5 For any chemical(s) purchased through the IFMP system, the purchase request is automatically routed to the appropriate contacts for purchase approval.
- 6.2.6 For any chemical(s) not ordered through the Marshall Retail Store or the Marshall IFMP system, the purchaser shall fax hazardous material procurement requests to AD10/Support Contractor, Environmental Engineer, at 544-8582 for review and approval. This will set in motion the necessary steps in 6.2.1 through 6.2.4.
- 6.2.7 If any purchase request is disapproved, the requestor will be notified as to reasons why. Replenishing PREVIOUSLY APPROVED stock will be excluded from the review/approval process.

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6.3 Using Hazardous Materials

- 6.3.1 Ensure that empty product containers are completely emptied and disposed of as described in MWI 8550.1, "Waste Management."
- 6.3.2 Rotate chemical inventory such that oldest chemicals are used first. This practice minimizes shelf-life expiration.
- 6.3.3 Dispose of spent (used) hazardous materials into waste accumulation containers when possible. Expired and unopened excess material must be turned in for disposal in its original container along with the material safety data sheet(s) (MSDS) as outlined in MWI 8550.1, "Waste Management."
- 6.3.4 Be familiar with the hazards of the chemicals in their work area and wear appropriate personnel protective equipment when handling the material per MPG 1840.2, "MSFC Hazard Communication Program."
- 6.3.5 When scheduling a move via the Service Request System (SRS), note in the justification section that "movement of hazardous materials is required."

6.4 Storing Hazardous Materials

- 6.4.1 Ensure that product containers are properly labeled, segregated, and MSDSs are readily available per MPG 1840.2, "MSFC Hazard Communication Program." If a MSDS is not available, the MSFC user organization must obtain one as soon as possible or turn in the chemical for waste disposal in accordance with MWI 8550.1, "Waste Management."
- 6.4.2 Restrict access to hazardous material storage areas to authorized personnel only.
- 6.4.3 Ensure that product containers/drums are sealed when not in use.
- 6.4.4 Ensure that dispensing containers have spring action or automatic closing devices.
- 6.4.5 Regularly inspect all hazardous material storage areas for leaking or severely corroded containers, and unneeded, out-of-shelf life, or unwanted products. Promptly correct all deficiencies noted during inspections.

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6.5 Chemical Inventory Reporting

6.5.1 For chemicals not procured through the Marshall Retail Store, the user shall complete and submit MSFC Form 4099, "MSFC Chemical Inventory Addition," to the EED for inventory updates. MSFC Form 4099 provides the organizational contact, name of person taking inventory, product name, storage code, container size, location where the chemical will be stored, and the MSDS number. The user shall either provide copies of MSDSs with MSFC Form 4099 or provide the existing MSDS number from the following hyperlink:

http://eemo.msfc.nasa.gov/environmental/haz mat/

- 6.5.2 If the chemical purchase is replenishing existing stock, MSFC user organizations are not required to submit MSFC Form 4099.
- 6.5.3 MSFC user organizations (Government and contractor) shall: (a) annually attend training provided by EED; (b) report and maintain inventories of hazardous chemicals used and/or stored onsite; (c) review, edit, and complete annual chemical inventory for organization activities or as requested. The POC prepares and submits a complete hazardous chemical inventory to EED for the organization.
- 6.5.4 EED will inspect MSFC user organizations' inventory of chemicals to verify accuracy of reported chemicals. All discrepancies are to be documented. MSFC user organizations are required to update their inventory by submitting MSFC Form 4099. The MSFC user organizations shall take immediate corrective action regarding any discrepancies found during routine environmental inspections.
- 6.5.5 EED maintains the MSFC chemical inventory and provides training as required.

7. NOTES

None

8. SAFETY PRECAUTIONS AND WARNING NOTES

None

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9. RECORDS

- 9.1 MSFC Form 4099, "MSFC Chemical Inventory Addition," is maintained by EED for 3 years, then disposed. Disposition authority is 40 CFR 372.10 (pending approval of NASA Records Retention Schedule [NRRS] 8/43K).
- 9.2 Chemical inventory reprints (Section 6.3.3) are maintained by EED for 3 years, then disposed. Disposition authority is 40 CFR 372.10 (pending approval of NRRS 8/43K).
- 9.3 Chemical Inventory Training records shall be retained by EED for 2 years, then disposed. Civil service personnel training records will be maintained in ADMINSTAR. Disposition authority is NRRS 33.B.1.

10. PERSONNEL TRAINING AND CERTIFICATION

All personnel who use hazardous chemicals are encouraged to attend Chemical Inventory training. All personnel responsible for maintaining chemical inventory for their organization or assigned area are required to attend this training per MPG 8500.1. Supervisors are responsible for ensuring that employees receive training per MPG 3410.1.

11. FLOW DIAGRAM

None

12. CANCELLATION

None

Original signed by Axel Roth for

David King Director